Supreme Court, U.S.
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No. 91-1079

In The

Supreme Court of the United States

October Term, 1991

STEPHEN R. SELINGER,

Petitioner,

v.

CITY OF REDLANDS,

Respondent.

Petition For Writ Of Certiorari To The Court Of Appeal, Fourth District, Division Two, State Of California

BRIEF OF RESPONDENT CITY OF REDLANDS IN OPPOSITION

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QUESTIONS PRESENTED

Respondent City of Redlands respectfully submits that petitioner Stephen R. Selinger's designation of the questions presented for review is incorrect. This is not an appeal which involves any issues of federal law whatsoever. The questions presented for review were previously correctly listed by the Court of Appeal (Fourth District, Division Two) for the State of California, as follows:

1. Did the City of Redlands fail to make the written findings required by California Government Code section 65589.5(j) that petitioner's project would have an adverse impact on traffic and on public health and safety?

2. Was the City of Redlands' decision to deny petitioner's project based on its finding that the project did not comply with the City of Redlands' General Plan supported by substantial evidence in the administrative record?

3. Was the City of Redlands' decision to deny petitioner's project based on the findings of an adverse impact on traffic and on public health and safety supported by substantial evidence in the administrative record?

4. In denying petitioner's project, did the City of Redlands violate petitioner's vested property rights under state law?

TABLE OF CONTENTS

Page(s)

QUESTIONS PRESENTED i

TABLE OF AUTHORITIES iii

STATUTES AND COURT RULES INVOLVED 1

1. INTRODUCTION 8

2. STATEMENT OF FACTS 9

3. PROCEDURAL REASONS TO DENY THE WRIT . 11

4. SUBSTANTIVE REASONS TO DENY THE WRIT . 14

A. SELINGER'S ARGUMENT THAT THE CITY DISAPPROVED THE PROJECT DESPITE A PREVIOUS DETERMINATION THAT THE PROJECT WAS CONSISTENT WITH THE GENERAL PLAN IS MISLEADING 14

B. THE COURT OF APPEAL CORRECTLY CONCLUDED THAT THE CITY'S DETERMINATION THAT THE PROJECT DID NOT COMPLY WITH THE GENERAL PLAN WAS BASED ON SUBSTANTIAL EVIDENCE IN THE RECORD 16

5. CONCLUSION 19

TABLE OF AUTHORITIES

Page(s)

CASES

Carmel Valley View, Ltd. v. Board of Supervisors, 58 Cal.App.3d 817 (1976) 16, 18

City of Walnut Creek v. County of Contra Costa, 101 Cal.App.3d 1012 (1980) 15

Penn Central Transportation Co. v. City of New York, 438 U.S. 104 (1978) 14

Selinger v. City of Redlands, 216 Cal.App.3d 259 (1989) ..... *passim*

Topanga Assoc. for a Scenic Community v. County of Los Angeles, 214 Cal.App.3d 1348 (1989) 16

Webb's Fabulous Pharmacies v. Arthur H. Beckwith, Jr., Clerk of the Circuit Court, 449 U.S. 155 (1980) 14

STATUTES:

California Public Resources Code section 21167 ....6, 15

California Government Code section 65589.5(j) i

OTHER:

Supreme Court Rule 10 ..... 1, 4, 14, 19

Supreme Court Rule 14 ..... 2, 12, 13

STATUTES AND COURT RULES INVOLVED

Supreme Court Rule 10 states:

Considerations Governing Review on Writ of Certiorari

.1. A review on writ of certiorari is not a matter of right, but of judicial discretion. A petition for a writ of certiorari will be granted only when there are special and important reasons therefor. The following, while neither controlling nor fully measuring the Court's discretion, indicate the character of reasons that will be considered:

(a) When a United States court of appeals has rendered a decision in conflict with the decision of another United States court of appeals on the same matter; or has decided a federal question in a way in conflict with a state court of last resort; or has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's power of supervision.

(b) When a state court of last resort has decided a federal question in a way that conflicts with the decision of another state court of last resort or of a United States court of appeals.

(c) When a state court or a United States court of appeals has decided an important question of federal law which has not been, but should be, settled by this Court, or has decided a federal question in a way that conflicts with applicable decisions of this Court.

.2. The same general considerations outlined above will control in respect to a petition for a writ of certiorari to review a judgment of the United States Court of Military Appeals.

Supreme Court Rule 14 states:

Rule 14. Content of the Petition for a Writ of Certiorari

.1. The petition for a writ of certiorari shall contain, in the order here indicated:

(a) The questions presented for review, expressed in the terms and circumstances of the case, but without unnecessary detail. The questions should be short and concise and should not be argumentative or repetitious. They must be set forth on the first page following the cover with no other information appearing on that page. The statement of any question presented will be deemed to comprise every subsidiary question fairly included therein. Only the questions set forth in the petition, or fairly included therein, will be considered by the Court.

(b) A list of all parties to the proceeding in the court whose judgment is sought to be reviewed, unless the names of all parties appear in the caption of the case. This listing may be done in a footnote. See also Rule 29.1 for the required listing of parent companies and nonwholly owned subsidiaries.

(c) A table of contents and a table of authorities, if the petition exceeds five pages.

(d) A reference to the official and unofficial reports of opinions delivered in the case by other courts or administrative agencies.

(e) A concise statement of the grounds on which the jurisdiction of this Court is invoked showing:

(i) The date of the entry of the judgment or decree sought to be reviewed;

(ii) The date of any order respecting a rehearing, and the date and terms of any order granting an extension of time within which to file the petition for a writ of certiorari;

(iii) Express reliance upon Rule 12.3 when a cross-petition for a writ of certiorari is filed under that Rule and the date of receipt of the petition for a writ of certiorari in connection with which the cross-petition is filed; and

(iv) The statutory provision believed to confer on this Court jurisdiction to review the judgment or decree in question by writ of certiorari.

(f) The constitutional provisions, treaties, statutes, ordinances, and regulations involved in the case, setting them out verbatim, and giving the appropriate citation therefor. If the provisions involved are lengthy, their citation alone will suffice at this point and their pertinent text must be set forth in the appendix referred to in subparagraph .1(k) of this Rule.

(g) A concise statement of the case containing the facts material to the consideration of the questions presented.

(h) If review of a judgment of a state court is sought, the statement of the case shall also specify the stage in the proceedings, both in

the court of first instance and in the appellate courts, at which the federal questions sought to be reviewed were raised; the method or manner of raising them and the way in which they were passed upon by those courts; and such pertinent quotation of specific portions of the record or summary thereof, with specific reference to the places in the record where the matter appears (e.g., ruling on exception, portion of court's charge and exception thereto, assignment of errors) as will show that the federal question was timely and properly raised so as to give this Court jurisdiction to review the judgment on a writ of certiorari. When the portions of the record relied upon under this subparagraph are voluminous, they shall be included in the appendix referred to in subparagraph .1(k) of this Rule.

(i) If review of a judgment of a United States court of appeals is sought, the statement of the case shall also show the basis for federal jurisdiction in the court of first instance.

(j) A direct and concise argument amplifying the reasons relied on for the allowance of the writ. See Rule 10.

(k) An appendix containing, in the following order:

(i) The opinions, orders, findings of fact, and conclusions of law, whether written or orally given and transcribed, delivered upon the rendering of the judgment or decree by the court whose decision is sought to be reviewed.

(ii) Any other opinions, orders, findings of fact, and conclusions of law rendered in the case by courts or administrative agencies, and, if reference thereto is necessary to ascertain the grounds of the judgment or decree, of those in companion cases. Each document shall include the caption showing the name of the issuing court or agency, the title and number of the case, and the date of entry.

(iii) Any order on rehearing, including the caption showing the name of the issuing court, the title and number of the case, and the date of entry.

(iv) The judgment sought to be reviewed if the date of its entry is different from the date of the opinion or order required in sub-subparagraph (i) of this subparagraph.

(v) Any other appended materials.

If what is required by subparagraphs .1(f), (h), and (k) of this Rule to be included in or filed with the petition is voluminous, it may be presented in a separate volume or volumes with appropriate covers.

.2. The petition for a writ of certiorari and the appendix thereto, whether in the same or a separate volume, shall be produced in conformity with Rule 33. The Clerk shall not accept any petition for a writ of certiorari that does not comply with this Rule and with Rule 33, except that a party proceeding in forma pauperis may proceed in the manner provided in Rule 39.

.3. All contentions in support of a petition for a writ of certiorari shall be set forth in the body of the petition, as provided in subparagraph .1(j) of this Rule. No separate brief in support of a petition for a writ of certiorari will be received, and the Clerk will refuse to file any petition for a writ of certiorari to which is annexed or appended any supporting brief.

.4. The petition for a writ of certiorari shall be as short as possible and may not exceed the page limitations set out in Rule 33.

.5. The failure of a petitioner to present with accuracy, brevity, and clearness whatever is essential to a ready and adequate understanding of the points requiring consideration will be a sufficient reason for denying the petition.

California Public Resources Code section 21167 provides:

Commencement of Actions or Proceedings; Time

Any action or proceeding to attack, review, set aside, void, or annul the following acts or decisions of a public agency on the grounds of noncompliance with this division shall be commenced as follows:

(a) An action or proceeding alleging that a public agency is carrying out or has approved a project which may have a significant effect on the environment without having determined whether the project may have a significant effect on the environment shall be commenced within 180 days of the public agency's decision to carry out or approve the project, or, if a project is undertaken without a formal decision by the

public agency, within 180 days after commencement of the project.

(b) Any action or proceeding alleging that a public agency has improperly determined whether a project may have a significant effect on the environment shall be commenced within 30 days after the filing of the notice required by subdivision (a) of Section 21108 or subdivision (a) of Section 21152.

(c) Any action or proceeding alleging that an environmental impact report does not comply with the provisions of this division shall be commenced within 30 days after the filing of the notice required by subdivision (a) of Section 21108 or subdivision (a) of Section 21152 by the lead agency.

(d) Any action or proceeding alleging that a public agency has improperly determined that a project is not subject to the provisions of this division pursuant to subdivision (b) of Section 21080 or pursuant to Section 21085 or 21172 shall be commenced within 35 days after the filing by the public agency, or person specified in subdivision (b) or (c) of Section 21065, of the notice authorized by subdivision (b) of Section 21108 or subdivision (b) of Section 21152. If such notice has not been filed, such action or proceedings shall be commenced within 180 days of the public agency's decision to carry out or approve the project, or, if a project is undertaken without a formal decision by the public agency, within 180 days after commencement of the project.

(e) Any action or proceeding alleging that any other act or omission of a public agency does not comply with the provisions of this

division shall be commenced within 30 days after the filing of the notice required by subdivision (a) of Section 21108 or subdivision (a) of Section 21152.

1. INTRODUCTION

If this case is, as petitioner Stephen R. Selinger ("Selinger") urges, a "typical California land use 'horror' story" (PW, p.1), it is the direct result of Selinger's stubborn refusal to make the necessary alterations to the configuration of his project to bring it in conformance with the City of Redlands' ("City") General Plan.[1]

Instead, Selinger has waged a bitter (and unnecessary) war with the City over *every* aspect of his project – a war which has lasted for over four years and taken the parties to three different levels of the judiciary in two separate writ of mandate proceedings.[2] Despite the fact that Selinger has radically altered the focus of his case even to the extent of raising new issues, the underlying purpose of the petition is the same, i.e., to obtain from this Court what the City and the judiciary have thus far refused – approval to build an unsafe subdivision.

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[1] All references in this brief to "PW" refer to Selinger's Petition For Writ of Certiorari filed with this Court.

[2] Selinger's first writ – regarding a different issue relating to the *same* project – resulted in the *Selinger v. City of Redlands*, 216 Cal.App.3d 259 (1989) (*"Selinger"*) decision.

2. STATEMENT OF FACTS

Although the *basic* facts of this case are largely undisputed and were previously established in another case before the state appellate court involving the same parties and subject matter, Selinger uses a considerable portion of his petition to disparage the City and its elected City Council through a series of unfounded and unsupported assertions.

In an effort to depict the City Council as an unscrupulous body of individuals, Selinger accuses the City Council of "inventing a perverted interpretation of its old ordinances" to "circumvent state law." (PW, p. 4.)[3]

These unfounded accusations aside, Selinger's brief also contains numerous mischaracterizations of the facts of this case. Rather than correct each and every one, we urge this Court to review the facts as recited by the state Court of Appeal in its opinion (PW, attached as Appendix 3).[4] These are the undisputed facts and were largely taken from the appellate court's previous decision in *Selinger*. Accordingly, the facts shall not be repeated here.

Procedural Overview

Selinger initially commenced this action in the San Bernardino Superior court by filing a petition for writ of

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[3] The City has had to endure similar attacks from Selinger in other courts. This continuing barrage of insults has, however, become progressively worse.

[4] "Opinion" refers to the Court of Appeal's written decision, a copy of which is attached to Selinger's petition starting at Appendix 3.

mandate compelling the City to approve a 304-lot residential subdivision (the "Project") located in a scenic area of the southeast portion of the City.

The Redlands City Council had previously denied the Project after considering, among other things, the results of the Environmental Impact Report ("EIR") for the Project, which identified unavoidable significant adverse impacts in the categories of traffic, wastewater disposal and cumulative impacts, and after holding a public hearing at which it reviewed testimony that unequivocally established that the Project would violate two of the three policies of the City's General Plan.[5]

Both at trial and in his original petition, Selinger argued that these findings were not based upon substantial evidence in the administrative record and, consequently, the City's decision to deny the Project was improper and unlawful.

The trial court disagreed with Selinger's contentions and found that the City's decision to deny the Project was supported by substantial evidence.

On appeal, the trial court's judgment was affirmed. At the heart of the Court of Appeal's decision was the conclusion that "substantial evidence supported the

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[5] Not surprisingly, the City denied the Project based upon its findings that: (1) the design and improvement of the subdivision were not consistent with the applicable General and Specific Plans of the City; (2) the site for the Project was unsuitable for the proposed density of the development; and (3) the design of the subdivision and the type of improvements necessitated by the Project were likely to cause a serious public health problem.

City's finding that the project was not consistent with the General Plan." (Opinion, PW – Appendix 16.) As a result, the Court of Appeal found it unnecessary to go further: "That finding was a sufficient basis for denying approval for the project. Therefore we need not consider Selinger's additional contentions." (Opinion, PW – Appendix 16.)[6]

Selinger next petitioned the California Supreme Court for review, without success. This petition followed.

3. PROCEDURAL REASONS TO DENY THE WRIT

Selinger's petition now seeks review of issues of public law, policy and planning which were never raised in the lower courts. In its opinion, the Court of Appeal (Fourth District, Division Two) correctly listed the issues presented for its consideration as whether "(1) the City failed to make required written findings that the project would have an adverse impact on traffic and on public health and safety; (2) the evidence would not support such findings; (3) there was no substantial evidence to support the finding that the project was inconsistent with the City of Redlands' General Plan; and (4) the City failed to preserve Selinger's vested rights." (Opinion, PW – Appendix 3 and 4.)

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[6] Both the trial court and the Court of Appeal found substantial evidence to support the City's decision and, for that reason, never needed to consider Selinger's contentions that he had a vested right to proceed with the project. To the extent that Selinger now uses this latter contention as a basis for review, the issue is not ripe.

Just as he attempted to do in his rejected petition for review to the California Supreme Court, Selinger now includes in his list of questions presented to this Court the general inquiry as to whether "due process prohibitions against vague economic ordinances prevent a municipality from disapproving a project on the basis of unfocused (general plan) policy statements." (PW, p. i.) Selinger tried to place this very same issue before the state Court of Appeal by lobbying the Building Industry Legal Defense Foundation ("BILDF") and the Building Industry Association of Southern California ("BIA") for support. Subsequently, attorneys for the BILDF and the BIA (a law firm which later undertook Selinger's representation at the state Supreme Court level) requested permission of the Court of Appeal to file an Amicus Curiae brief which focused on that subject matter. The Court of Appeal rightly denied the application.

Selinger's persistent efforts to inject broader issues of policy into this case – a case of insufficient legal or public interest to warrant either publication by the Court of Appeal or review by the California Supreme Court – flies in the face of the well-established rule that issues which could have been but were not timely raised in the lower courts are *not* subject to review.

Thus, Selinger's petition for review in this Court fails to comply with Supreme Court Rule 14, which states:

> *"If review of a judgment of a state court is sought, the statement of the case shall also specify the stage in the proceedings, both in the court of first instance and in the appellate courts, at which the federal questions sought to be reviewed were raised;* the method or manner of raising them and the way

> in which they were passed upon by those courts; and such pertinent quotation of specific portions of the record or summary thereof, with specific reference to the places in the record where the matter appears (e.g., ruling on exception, portion of court's charge and exception thereto, assignment of errors) as will show that the federal question was timely and properly raised so as to give this Court jurisdiction to review the judgment on a writ of certiorari." (Emphasis added.)

To the extent that Selinger now proposes review of issues relating to public policy, planning and due process, his brief contains no specific references to "the stage in the proceedings, both in the court of first instance and in the appellate courts," at which such federal questions were raised, as required by Rule 14. Selinger's inability to comply with this rule is, of course, a function of the fact that these issues were never raised below.

The other question which Selinger presents for this Court's consideration – whether a "partial taking" of a well-defined property right is a violation of the United States Constitution – is now for the first time being characterized as an issue of federal rather than state law. When presented to the Court of Appeal, this issue was expressed only in terms of whether "the City failed to preserve Selinger's vested rights." (Opinion, PW – Appendix 3 and 4.) No mention was made at either the trial or appellate court levels of whether the City's alleged actions violated the United States Constitution or indeed any federal law.

By raising now a new issue and recharacterizing another, Selinger's petition at first glance appears to fit

within those items listed in Supreme Court Rule 10 as considerations for review by this Court. On closer inspection, however, Selinger's petition does not pass muster. Thus, Selinger's lengthy discussion of two past decisions of this Court – *Penn Central Transportation Co. v. City of New York*, 438 U.S. 104 (1978) and *Webb's Fabulous Pharmacies v. Arthur H. Beckwith, Jr., Clerk of the Circuit Court*, 449 U.S. 155 (1980) – is notable only because Selinger has never before cited, discussed or even mentioned these cases in any lower court.

The reason for Selinger's untimely and contrived fascination for the *Penn Central* and *Webb* decisions is clear. Through a distorted interpretation of these decisions, Selinger is able to create an artificial conflict between them. This, Selinger says, is a basis for review. (PW, pp. 10 and 11.) We respectfully submit that if this Court felt that it was either likely or possible that two of its own decisions could be in such conflict, this possibility would have been specifically enunciated in Supreme Court Rule 10 as one possible ground for review.

For these reasons and those explained more particularly below, the City respectfully requests that the petition be denied.

4. SUBSTANTIVE REASONS TO DENY THE WRIT

A. SELINGER'S ARGUMENT THAT THE CITY DISAPPROVED THE PROJECT DESPITE A PREVIOUS DETERMINATION THAT THE PROJECT WAS CONSISTENT WITH THE GENERAL PLAN IS MISLEADING

A recurrent theme in Selinger's sustained effort to overturn the trial court's judgment centers upon his claim

that "after just certifying an environmental impact report stating that the project was consistent with the zoning and general plan, and after having studied the project for 20 months, the City asserted for the first time that the project was inconsistent with the general plan." (PW, p. 7.)

In his petition, Selinger cavalierly brushes over the fact that the Environmental Impact Report ("EIR") itself identified unavoidable significant adverse impacts in the categories of traffic, wastewater disposal and cumulative impacts. Selinger's sole response at the Court of Appeal to the conclusions reached in the EIR was to attack the validity of the EIR's findings, despite the fact that Selinger had previously failed to challenge the sufficiency of the EIR within the statutory time period set forth in California Public Resources Code section 21167. Selinger apparently wants to have his cake and eat it too. Thus, he claims that the City should be bound by the EIR's conclusion that the Project complies with the City's General Plan, but should not be required to follow its findings that there existed unavoidable significant adverse impacts.[7]

But Selinger's theme rings hollow for another reason, which was quickly spotted by the Court of Appeal and was explained in its Opinion in the following manner:

> "Next, Selinger notes that the City Council certified the EIR for the Project, and the EIR stated,

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[7] The EIR, standing alone, can form the substantial evidence required to justify an administrative agency's decision. (*City of Walnut Creek v. County of Contra Costa*, 101 Cal.App.3d 1012, 1018-1019 (1980).)

> 'Tentative Tract 13294, as proposed, is consistent with both the City's General Plan and zoning for the subject site.' To approve a Tentative Map, the local agency must make an affirmative finding that the map is consistent with the applicable General and Specific Plans. [Citation.] *A statement of consistency in the EIR is not such a finding; an EIR is an informational document which an agency may use as evidence to guide its land use decisions.* [Citation.] *The statement of consistency in the EIR did not preclude that City Council from reaching a contrary conclusion in ruling on the Project application.*" (Opinion, PW – Appendix 15.) (Emphasis added.)

The Court of Appeal's rejection of Selinger's argument in this regard is both logical and supported by case law. (See *Carmel Valley View, Ltd. v. Board of Supervisors*, 58 Cal.App.3d 817, 822 (1976).)

B. THE COURT OF APPEAL CORRECTLY CONCLUDED THAT THE CITY'S DETERMINATION THAT THE PROJECT DID NOT COMPLY WITH THE GENERAL PLAN WAS BASED ON SUBSTANTIAL EVIDENCE IN THE RECORD

Below, the Court of Appeal, quoting from *Topanga Assoc. for a Scenic Community v. County of Los Angeles*, 214 Cal.App.3d 1348 (1989), noted that the standard for determining the adequacy of the findings of a public agency was whether those findings are:

> "[S]ufficient to enable the parties to determine whether and upon what basis they should seek

> review and to allow a reviewing court to determine the basis for the agency's action. [Citation.] However, great specificity is not required. It is enough if the findings form an analytical bridge between the evidence and the agency's decision. [Citation.] In addition, findings are to be liberally construed to support rather than defeat the decision under review. [Citation.]" (Opinion, PW – Appendix 8.)

Selinger's contention that the City's decision to deny the Project was *not* based upon the existence of substantial evidence in the administrative record is misplaced. In fact, the record indicates that in considering Selinger's Project, the City considered a number of sources of relevant and credible information which constitute substantial evidence, including the following:

- Planning Staff Report to the City.[8]
- EIR for the Project and the technical reports used in its preparation.
- Ludwig Traffic Study.
- Testimony of various concerned citizens who appeared at the City's hearing to voice their opposition to the Project.
- Testimony of the City's Planning Staff.

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[8] The Planning Staff Report incorporates summaries of other documents examined by the City and also contains a useful analysis of the City's reasons for denial of the application. Regarding this document, the Court of Appeal noted: "Despite Selinger's criticisms, the Staff Report provides an evidentiary basis for the City Council's action." (Opinion, PW – Appendix 14.)

- The City's General Plan in effect at the time Selinger's Project application was deemed to be complete.

Mindful of the existence of these documents in the record, the Court of Appeal concluded:

> "Here, likewise, the Planning Commission voted to deny approval, and on appeal, recommended that the City Council deny approval of the Project. The Planning Commission's recommendations were presented to the City Council in the form of a staff report and in the testimony of the City's Planning Director. Other citizen witnesses testified in opposition to approving the Project. Selinger testified in favor of the Project and challenged the recommendations of the Planning Commission and its proposed findings. In disapproving the Project, the City Council in effect adopted the written findings included in that Staff Report. We conclude, as did the court in *Carmel Valley*, that the oral finding of inconsistency with the General Plan was legally adequate." (Opinion, PW – Appendix 11.)

In light of the written report prepared by the planning staff, the testimony of the planning staff, and the testimony of others who testified at the hearing, including Selinger, the City's findings made at its April 19, 1988 meeting were supported by substantial evidence in light of the record as a whole and the Court of Appeal's affirmation of this fact should not be overturned.

5. CONCLUSION

Based on the foregoing, Respondent City of Redlands respectfully requests that Selinger's Petition for Review be denied based on the absence of any special or important reasons under Supreme Court Rule 10 to grant review.

Respectfully Submitted,

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